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Andrew Mohan

From: Andrew Mohan
Sent: Thursday, January 25, 2024 10:40 PM
To: 'Roberta Kaplan'; 'Shawn G. Crowley'; 'ahabba@habbalaw.com';
'mmadaio@habbalaw.com'; 'Joshua Matz'; 'Matthew Craig'; 'Trevor Morrison'
Subject: Regarding the Charge in Carroll v. Trump 20-cv-7311(LAK)
Importance: High

Good Evening Counsel, Judge Kaplan has asked me to relay that the Court has adopted, in words or in substance, the plaintiff's proposed charges with respect to whether the jury may offset against Ms. Carroll's damages any purported benefit she received and with respect to whether Ms. Carroll consented to or assumed the risk of Mr. Trump's defamatory statements. As to the latter, it intends to charge as requested by the plaintiff in Dkt 275, Exhibit A. It has adopted also plaintiff's request to change the verdict form to combine the questions of compensatory damages with respect to the two statements at issue and has made corresponding changes in the charge.

Andrew Mohan
Courtroom Deputy to Judge Kaplan